

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SQUARE D COMPANY and SCHNEIDER	)	
ELECTRIC, S.A.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CASE NO.: 07 C 6294
	)	
ELECTRONIC SOLUTIONS, INC., and	)	Judge James B. Moran
WILLIAM AMBROS,	)	
	)	
Defendants.	)	

**AGREED CONSENT ORDER FOR  
PRELIMINARY INJUNCTIVE RELIEF**

Plaintiffs Square D Company ("Square D") and Schneider Electric, S.A. ("Schneider") (collectively "Plaintiffs" and defendants Electronic Solutions, Inc. and ESI of Central Florida, Inc. (incorrectly sued as Electronic Solutions, Inc.) (hereinafter collectively ("ESI")) and William Ambros agree to entry of the following consent order for preliminary injunctive relief:

1. On January 22, 2008, Square D filed its Motion for Preliminary Injunction seeking, among other relief, an order enjoining Defendants from directly or indirectly selling, transferring, destroying or otherwise disposing of any electrical products in its possession that bear the trademarks SCHNEIDER ELECTRIC®, SQUARE D®, TELEMECANIQUE® or MERLIN GERIN® (hereinafter the "Trademarks") until such time as Plaintiffs have inspected Defendants' inventory for the presence of counterfeit products.

2. The parties acknowledge and agree that service of the complaint and summons on Electronic Solutions, Inc. is also valid as to ESI of Central Florida, Inc., that ESI of Central Florida, Inc. is and shall be a named defendant in this action, and that ESI of Central Florida, Inc. is bound by the terms of this order.

**Exhibit A**

3. This Court has subject matter jurisdiction over this matter because it raises a federal question pursuant to 28 U.S.C. § 1331. This Court also has personal jurisdiction over the defendants.

4. Defendant Ambros as well as Defendant ESI, its officers, agents, servants, employees and those persons acting in concert with them are enjoined from selling, transferring or otherwise disposing of any electrical products that bear the Trademarks in their possession, custody or control from February 8, 2008 through the conclusion of the inspection of Defendant's physical inventory which shall conclude no later than February 29, 2008. These dates may be adjusted by agreement of the parties.

5. By the close of business on February 14, 2008, Defendants will provide Plaintiffs with an inventory list identifying all electrical products bearing the Trademarks in their possession, custody and control.

6. Prior to the inspection, but following Defendants' provision of the inventory list pursuant to paragraph 4, above, Plaintiffs will disclose to Defendants how Plaintiffs will visually inspect the electrical products inventory for the presence of counterfeit products and will disclose during the inspection the basis for any determinations it makes that counterfeit products are present. The location of the inspection shall be the ESI of Central Florida, Inc. warehouse facility in Plant City, Florida, at a location in that facility to be determined by Defendants.

7. Upon completion of the inspection, Plaintiffs will withdraw their motion for preliminary injunction, but the terms of this order shall remain in full force and effect.

8. Defendants are preliminarily enjoined from selling and will preserve as evidence any and all electrical products identified by Plaintiffs as counterfeit during the inspection.

9. Defendants will preserve as evidence all documents in their possession, custody and control relating to the purchase and sale of electrical products bearing the Trademarks.

10. Defendants' time to answer or otherwise plead in response to Plaintiffs' Verified Complaint is enlarged to fourteen days after Plaintiffs report the results of the inspection, or February 29, 2008, whichever is later.

Agreed

Agreed

/s/ Riccardo A. DiMonte

Riccardo A. DiMonte  
Counsel for Defendants William Ambros and  
ESI of Central Florida, Inc.  
February 7, 2008

/s/ Christopher T. Sheean

Christopher T. Sheean  
Counsel for Square D Company & Schneider  
Electric, S.A.  
February 7, 2008

ENTERED:

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JUDGE JAMES B. MORAN